

Marla McDade Williams
Deputy Administrator
Division of public and Behavioral Health
medicalmarijuana@health.nv.gov

Response to proposed amendments to Nevada Administrative Code (NAC) 453A

Sec. 25.

The Senate Bill No. 374 is unclear as to how many cultivation facilities will be allowed to open in Nevada. It is important that the numerous applicants desiring to open cultivation facilities know how many cultivation sites the Division will allow.

Sec. 25 – 3a

It is unclear as to whether a business that will open in Nevada with duo purpose, i.e., cultivating/dispensing, cultivating/edible production, dispensing/edible production of MM can show the same liquidity. In starting up a business concurrently with two or three segments does not need \$500,000 to \$750,000 in liquidity because the start up costs will not be doubled or tripled.

Sec. 26. – 2.

It is unclear whether a cultivation site applicant and dispensary site applicant need to file separate applications for each business segment. Will each business segment need to file a separate application and send the \$5,000 application fee each business segment?

Sec. 26 – 13.

In this section is it the intent of the Division to allow an application to be processed without obtaining jurisdictional zoning approval as long as a survey is submitted in lieu of the zoning approval?

Sec. 28.

The application points assessed for applicants are unclear for cultivation facilities. It would be helpful to know the number of cultivation applications that will be accepted by the Division.

Sec. 34.

If an approved medical marijuana establishment is delayed in becoming fully operational within 12 months because of jurisdictional approval issues unforeseen by the operator, will any extension of the 12 months period be available to the establishment prior to the certificate being revoked?

Sec. 35.

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To clarify is this requirement to surrender the MM Certificate during the annual review process, if any changes in ownership or location are experienced in the approved business?

If that is the case, it would be better to require **reapplication** not **surrender** of the certificate so the going concern business can continue in business and continue to pay taxes and fees to the state while the new or changed information is validated by the Division during the reapplication process.

Sec. 36 - 3.

Annual "Audited" financial is an excessive requirement for all small businesses. A tier system according to the company revenues would be more suitable, i.e.,

\$1,000,000 or less in annual revenues - a CPA "Compilation Report" requirement.

\$1,000,001 to \$10,000,000 in annual revenues - a "Reviewed Report" requirement.

\$10,000,001 and above in annual revenues – an "Audited Report" requirement.

Sec. 39.

Will there be a hardship in processing an application or reason to decline an application if an owner or corporation/business entity desires to open a duo entity business, i.e., cultivation/dispensary entity or cultivation/edibles production entity or dispensary/edible production entity?

Sec. 40.

To obtain or renew a medical marijuana establishment agent registration card the identification necessary is confusing, is the ID needing to be submitted one form of ID OR is it two forms of ID? Can an applicant offer a Nevada ID or a Passport?

Sec.41.

Can an applicant apply for a duo MME agent card for two of the 4 categories allowed?

The Division should consider a Transportation MME agent registration card category with a larger transportation inventory level than 10 ounces when numerous deliveries are made by a MM dispensary that offers delivery services for home bound patients.

Who provides the training for agents receiving the MM establishment agent card? The State or a Nevada State approved training company?

Sec. 50.

Why must the Division control the company name, marketing, advertising and logo?

Green Life, Inc.

Sec.51.

How does a cultivating company transport samples to the lab if the testing has not been completed? Does the lab come to the cultivation site location to perform the testing or does the lab have a special transportation permit to transport the untested products.

Sec. 56.

Will the State of Nevada offer an electronic verification system to the MM dispensaries in the state listing updated and valid MM patients and caregivers card holders?

Sec. 105 – a.

What is a suitable size for a cultivation site or dispensary or edibles kitchen?

Sec. 132.

What will the production limit of marijuana be in Nevada?

Sec. 137.

Why must the state track the attending physician who advises patients about using medical marijuana? Are other patients and their prescriptions tracked in this manner?

Sincerely,

Sharlene Lewis-McGinnis
Green Life, Inc.